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Attorneys for Defendant
ALLSTATE INSURANCE COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FOSTER FARMS DAIRY,

Plaintiff,

vs.

ALLSTATE INSURANCE COMPANY,

Defendant.

No. C 03 02426 MJJ

STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING PRETRIAL
DEADLINES

The parties, by and through their respective counsel of record, hereby stipulate and agree as follows and respectfully request that the Court approve and give effect to their stipulation:

WHEREAS, a Pretrial Conference is scheduled to take place in this case on June 6, 2006;

WHEREAS, the Court has ordered the parties to file a joint pretrial conference statement, to file jury instructions, and to exchange exhibits no later than May 17, 2006;

1 WHEREAS, the Court has ordered the parties to file motions in limine, exhibit and
2 witness lists, objections to other evidence, proposed questions for voir dire and verdict forms no
3 later than May 22, 2006;

4 WHEREAS, the parties' cross-motions for summary judgment were heard on May 2,
5 2006 and the Court has not yet ruled on those motions;

6 WHEREAS, the parties' pretrial preparation and submissions will be significantly
7 impacted by the Court's ruling on the cross-motions for summary judgment;

8 WHEREAS, a continuance of the May 17, 2006 and May 22, 2006 pretrial deadlines will
9 not effect the trial date or the date of the pretrial conference;

10 IT IS HEREBY STIPULATED AND AGREED that the deadline for the parties to file a
11 pretrial statement, to file jury instructions, and to exchange exhibits is continued from May 17,
12 2006 to May 24, 2006;

13 IT IS FURTHER STIPULATED AND AGREED that the deadline for the parties to file
14 motions in limine, exhibit and witness lists, objections to other evidence, proposed questions for
15 voir dire and verdict forms shall be continued from May 22, 2006 to May 30, 2006.

16 IT IS FURTHER STIPULATED AND AGREED that the deadline for the parties to file
17 oppositions to motions in limine shall be continued from May 30, 2006 to ~~June 5, 2006~~
June 2, 2006.

18 IT IS SO STIPULATED.

19 Dated: May 12, 2006

Respectfully submitted,

20 BOUTIN DENTINO GIBSON DIGUISTO
21 HODELL, INC

22 By _____/S/

23 Robert D. Swanson

24 Attorneys for Plaintiff
25 FOSTER FARMS DAIRY

Dated: May 12, 2006

SONNENSCHN NATH & ROSENTHAL LLP

By _____/S/_____

Michael Barnes

Attorneys for Defendant
ALLSTATE INSURANCE COMPANY

IT IS SO ORDERED.

5/15/2006



U.S. District Court Judge